

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MICHAEL AKSMAN,)	
)	
)	
<i>Petitioner,</i>)	
)	
-against-)	Civil Action No. 1:20-cv-08045
)	
GREENWICH QUANTITATIVE)	
RESEARCH, LP,)	
)	
<i>Respondent.</i>)	
)	

DECLARATION OF SERINE CONSOLINO

Pursuant to 28 U.S.C. § 1746, I, Serine Consolino, hereby submit this Declaration in support of Greenwich Quantitative Research LP’s Response in Opposition to Michael Aksman’s Petition to Vacate the Arbitration Award, and state as follows.

1. I am a partner at the law firm of Aegis Law Group LLP in Washington, D.C. I represent Claimant Greenwich Quantitative Research LP (“Greenwich”) in the above-captioned proceeding and represented Greenwich during the pendency of JAMS Proceeding No. 1425031204. The facts stated herein are based on my personal knowledge.
2. On or about November 8, 2019, I emailed a courtesy copy of the Demand for Arbitration to the email address maksman123@gmail.com, which I understood to be Michael Askman’s regular email address. I received no response.
3. On or about November 8, 2019, I sent the Demand for Arbitration to Equities Global Analytics, LLC, 400 Washington Avenue, Martinsville, NJ 08836 via federal express overnight, which I understood to be the principal business address of Michael Aksman’s consulting firm, Equities Global Analytics LLC.
4. On or about November 20, 2019, I sent the Demand for Arbitration to 8 Kent Place, North Plainfield, New Jersey (“8 Kent Place”) via federal express overnight, tracking number 777040966745 (the “federal express package”). A true and correct copy of the federal express delivery notification is attached here to as Exhibit A.
5. On or about the week of November 21, I spoke to an individual on the telephone who identified himself or herself as an employee of Federal Express. The individual explained to me that a person at 8 Kent Place had rejected the federal express package because no one by the name of “Michael Aksman” resided at that address, or words to that effect. Thereafter, the federal express package was returned to sender.

6. On January 9, 2020, I sent an email to Patrick Mullarkey, the JAMS case coordinator for JAMS Proceeding No. 1425031204, informing him that Michael Aksman's home address was 8 Kent Place, North Plainfield, NJ, 07063. A true and correct copy of that email is attached hereto as Exhibit B.
7. On or about March 6, 2020, I emailed Claimant's Requests for Production in JAMS Proceeding No 1425031204 to Michael Aksman at maksman123@gmail.com. I received no response.
8. On or about March 6, 2020, I sent Claimant's Requests for Production in JAMS Proceeding No. 1425031204 to 8 Kent Place via federal express. That shipment was returned to sender.
9. On March 11, 2020, I caused to be served a copy of Preliminary Conference Report on Michael Aksman via USPS Certified Mail at 8 Kent Place, tracking number 70192970000103441664. That shipment was returned to sender. A true and correct copy of the Preliminary Conference Report is attached hereto as Exhibit C.
10. On March 12, 2020, I caused to be served a copy of an Arbitration Summons to Testify and Present Documentary Evidence to Sean Trager on Michael Aksman via USPS Certified Mail at 8 Kent Place North Plainfield, NJ 07063, tracking number 70192970000103441664. That shipment was returned to sender.
11. On or about April 8, 2020, I emailed Claimant's witness list in the above-captioned proceeding to Shakiya Wright-McDuffie, cc'ing Michael Aksman at maksman123@gmail.com. I received no response.
12. At no point did Michael Aksman or any attorney or representative thereof ever participate in JAMS Proceeding No 1425031204 in any way, lodge any objections to arbitrability, communicate with Greenwich or any attorney or representative thereof after the filing of the Demand for Arbitration, respond to any pleading, or attend the April 16, 2020 arbitration hearing.
13. Attached hereto as Exhibit D is a true and correct copy of the Final Arbitration Award issued by the arbitrator in JAMS Proceeding No 1425031204.
14. Attached hereto as Exhibit E is a true and correct copy of Claimant's Demand for Arbitration filed with JAMS in JAMS Proceeding No. 1425031204 .
15. Attached hereto as Exhibit F is a true and correct copy of a December 19, 2019 affidavit of Roger Padilla.
16. Attached hereto as Exhibit G is a true and correct copy of a January 17, 2020 affidavit of Kenneth Cummings.

17. Attached hereto as Exhibit H is a true and correct copy of the JAMS Comprehensive Arbitration Rules and Procedures as of October 6, 2020.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 6th day of October, 2020.

Serine R. Consolino

Serine Consolino